

THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

SONIA NOEMI SANTIAGO TORRES

DEBTOR

CASE NO. 15-08710/BKT

CHAPTER 13

**DEBTOR'S MOTION FOR EXTENSION OF TIME
TO REPLY TO TRUSTEE'S MOTION TO DISMISS, DOCKET #17**

TO THE HONORABLE COURT:

NOW COMES, SONIA NOEMI SANTIAGO TORRES, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On December 3, 2019, the Chapter 13 Trustee filed a Motion to Dismiss, Docket No. 17, alleging that the Debtor has defaulted in her Plan payments in the sum of \$560.00.

2. The Debtor today, January 10, 2020, met with the undersigned attorney regarding this matter and respectfully submits that she did incur in Plan arrears due to certain economic problems.

3. The Debtor respectfully submits to this Honorable Court that she needs thirty (30) days within to cure the arrears, favorably resolve this situation and reply to the Motion to Dismiss, Docket No. 17, which extension time to expire on February 9, 2020.

WHEREFORE, the Debtor, through her undersigned attorney respectfully requests that for the above stated reasons this Honorable Court grant the requested extension of time.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to the Debtor to her address of record.

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Debtors' Motion for Extension of Time
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RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 10th day of January, 2020.

/s/ Roberto Figueroa Carrasquillo
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